

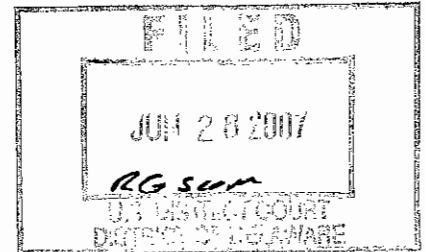
IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE

WILLIAM FRANCIS, JR.
Plaintiff,

v.

C.A. No. 07-015-JJF

WARDEN THOMAS CARROLL,
CORRECTIONAL MEDICAL SERVICES,
STAN TAYLOR, and JOYCE TALLEY,
Defendants.



NOTICE OF AND MOTION FOR THE APPOINTMENT OF COUNSEL

COMES NOW, PLAINTIFF WILLIAM FRANCIS, JR., pro se and gives notice this Honorable Court that plaintiff is seeking appointment of counsel to represent him in the above-captioned case.

Plaintiff William Francis, Jr., pursuant to 28 U.S.C. Section 1915, requests this court to appoint counsel to represent him in this case for the following reasons:

1. Plaintiff lacks the financial resources to retain competent and experienced counsel.
2. The legal and medical issues involved in this case are complex and plaintiff does not have sufficient knowledge to prosecute his case before the court.
3. Plaintiff, as an inmate at the Delaware Correctional Center (DCC), does not have access to the internet – filtered or limited to legal research websites such as LEXIS and WESTLAW – in order to find applicable case law to support his allegations and arguments.
4. Plaintiff does not have open access to a conventional and unrestricted telephone system, e-mail and fax in order to contact medical-dental professionals; accredited

and reputable agencies, organizations and associations; and expert witnesses required for a jury trial.

5. Plaintiff does not have the ability to investigate the facts; identify, question and depose witnesses; and to access, analyze and take possession of copies of his dental/medical records from the Federal Bureau of Prisons (BOP), DCC and CMS, due to his status as an inmate, administrative and corporate policy, rules and regulations.

DATED: June 27, 2007

S/ William Francis, Jr.
William Francis, Jr., plaintiff, pro se
#264560
Delaware Correctional Center
1181 Paddock Road
Smyrna, DE 19977

Certificate of Service

I, William Francis, Jr. hereby certify that I have served a true and correct copy(ies) of the attached NOTICE OF AND MOTION FOR THE APPOINTMENT OF COUNSEL and AFFIDAVIT IN SUPPORT upon the following parties/persons:

To: Office of the Clerk

United States District Court

844 N. King Street, Lockbox 18

Wilmington, Delaware 19801-3570

To: Megan T. Mantzavinos, Esquire

Ryan M. Ernst, Esquire

913 Market Street, #800

Wilmington, DE 19801

To:

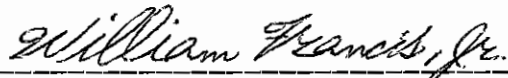
To:

To:

To:

BY PLACING IN A SEALED ENVELOPE, and depositing same in the United States Mail at the Delaware Correction Center, Smyrna, DE 19977.

On this 27th day of june, 2007



William Francis, Jr., plaintiff, pro se

SBI # 264560

WM William Francis, Jr.
SBI# 264560 UNIT W-D-22
DELAWARE CORRECTIONAL CENTER
1181 PADDOCK ROAD
SMYRNA, DELAWARE 19977

U.S.M.S.
X-RAY

Office of the Clerk
U.S. District Court
844 N. King Street, Lockbox 18
Wilmington, Delaware
19801-3570

